

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TP GROUP-CI, INC.
Plaintiff,

v.

IVAN VETECNIK,
Defendant.

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Case No. _____

PLAINTIFF'S MOTION FOR EXPEDITED DISCOVERY

Please take notice that, pursuant to Federal Rule of Civil Procedure 26(d)(1), Plaintiff TP Group-CI, Inc., by and through its attorneys, respectfully moves for the entry on an Order, attached hereto as Exhibit A, granting it leave to serve limited, expedited party discovery prior to a Rule 26(f) conference. Plaintiff's proposed Requests for the Production of Documents, to be answered within fourteen (14) days, are attached hereto as Exhibit B. This expedited discovery will be part of the expedited schedule as proposed in Plaintiff's Motion for Preliminary Injunction. In support of its Motion, Plaintiff files the accompanying Memorandum of Law.

Dated: July 22, 2016

/s/ Jody C. Barillare

Colm F. Connolly (#3151)

Jody C. Barillare (#5107)

MORGAN, LEWIS & BOCKIUS LLP

1007 N. Orange Street, Suite 501

Wilmington, Delaware 19801

Telephone: (302) 574-3000

Facsimile: (302) 574-3001

OF COUNSEL:

Daniel D. Rubinstein

William C. O'Neil

Michael A. Skokna

WINSTON & STRAWN, LLP

35 West Wacker Drive

Chicago, Illinois 60601

Telephone: (312) 558-5600

Facsimile: (312) 558-5700

Attorneys for Plaintiff TP Group-CI, Inc.